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Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEX VILLANUEVA,

Plaintiff,

v.

COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
SHERIFF'S DEPARTMENT, LOS  
ANGELES COUNTY BOARD OF  
SUPERVISORS, COUNTY EQUITY  
OVERSIGHT PANEL, LOS  
ANGELES COUNTY OFFICE OF  
INSPECTOR GENERAL,  
CONSTANCE KOMOROSKI,  
MERCEDES CRUZ, ROBERTA  
YANG, LAURA LECRIVAIN,  
SERGIO V. ESCOBEDO, RON  
KOPPERUD, ROBERT G. LUNA,  
MAX-GUSTAF HUNTSMAN,  
ESTHER LIM, and DOES 1 to 100,  
inclusive,

Defendants.

**CASE NO. 2:24-cv-04979 SVW (JCx)**

**DECLARATION OF JASON H.  
TOKORO IN SUPPORT OF  
DEFENDANTS' MOTION TO  
QUASH PLAINTIFF'S TRIAL  
SUBPOENAS OR, IN THE  
ALTERNATIVE MOTION *IN*  
*LIMINE***

*[Filed Concurrently with Notice of  
Motion; Memorandum of Points and  
Authorities; and [Proposed] Order]*

Date: June 2, 2025

Time: 1:30 p.m.

Crtrm.: 10A - First Street Courthouse

Assigned to the Hon. Stephen V.  
Wilson, Crtrm. 10A and Magistrate  
Judge Jacqueline Chooljian, Crtrm. 750

Trial Date: June 3, 2025

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**DECLARATION OF JASON H. TOKORO**

I, Jason H. Tokoro, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Miller Barondess, LLP, counsel of record for Defendants. I have personal knowledge of the facts set forth herein, and if called as a witness, I could and would competently testify to all of said facts. I make this declaration in support of Defendants' Motion to Quash Plaintiff Alex Villanueva's Trial Subpoenas Or, In the Alternative, Motion *In Limine*.

**The Court Grants Defendants' Motion For Protective Order**

2. Plaintiff previously sought to take the depositions of Los Angeles County Board Supervisors Hilda Solis and Janice Hahn and Los Angeles County Sheriff Robert Luna.

3. The County objected based on the apex doctrine, and filed a motion for protective order. (*See* Dkt No. 86.)

4. On April 10, 2025, Magistrate Judge Jacqueline Chooljian granted the motion. (*See id.*)

5. In the Order, the Court found the following:

(1) the three witnesses in issue qualify for treatment as "apex" witnesses; (2) there are no extraordinary circumstances that warrant the taking of their depositions; and (3) such witnesses do not appear to have unique first-hand, non-repetitive knowledge of the facts at issue in the case that has not been or could not be obtained through less intrusive discovery methods. (*Id.* at 3.)

6. Plaintiff did not seek review of the Order.

**Plaintiff Never Sought To Depose Supervisors Barger, Horvath, Or Mitchell**

7. Plaintiff never sought to take the depositions of Los Angeles County Board Supervisors Kathryn Barger, Lindsey Horvath, or Holly Mitchell.

**Plaintiff Has Not Served Three Witnesses**

8. While Plaintiff has listed each of the Apex Witnesses on his trial

1 witness list, he has only served Defendants with trial subpoenas for Supervisors  
2 Hahn and Solis and Sheriff Luna.

3 9. Plaintiff has stated that he plans to serve trial subpoenas for Supervisors  
4 Barger, Horvath, and Mitchell.

5 10. Plaintiff has already identified on his trial witness list every person who  
6 was involved in the Huntsman and Lim complaints, investigations, and outcome.

7 **The Parties' Meet And Confer Efforts**

8 11. On May 13, 2025, I met and conferred with Plaintiff's counsel, Alex  
9 DiBona, regarding the substance of this Motion, but no agreement could be reached.  
10 Plaintiff would not agree to not to call the Apex Witnesses who are the subject of  
11 this Motion.

12 I declare under penalty of perjury under the laws of the United States of  
13 America that the foregoing is true and correct.

14 Executed on this 14th day of May, 2025, at Los Angeles, California.

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16 /s/ Jason H. Tokoro  
17 Jason H. Tokoro  
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